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7 **UNITED STATES DISTRICT COURT**  
8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
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10 IN RE: SOCIAL MEDIA ADOLESCENT  
11 ADDICTION/PERSONAL INJURY  
12 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

13 THIS DOCUMENT RELATES TO:  
14 ALL ACTIONS

~~PROPOSED~~ ORDER RE JOINT  
DISCOVERY LETTER BRIEF ON  
PLAINTIFFS' RFP NOS. 16 AND 18  
TO GOOGLE LLC AND YOUTUBE,  
LLC (DKT. NO. 1197)

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1 The Court hereby ORDERS the following regarding PI/SD Plaintiffs' Requests for  
2 Production ("RFP") Nos. 16 and 18 to Defendants YouTube, LLC and Google, LLC (together,  
3 "Defendants"), pursuant to the Court's Discovery Management Conference on October 24, 2024.

4 a) With regard to RFP No. 16, which seeks "[d]ocuments sufficient to show all  
5 features, classifiers, data sets, dimensions, and/or demographics that [Defendants]  
6 use to categorize users of, or accounts on, [the YouTube Platform] [,]" Plaintiffs  
7 have agreed to limit this RFP to three categories (user research, advertising, and  
8 growth teams) and YouTube claims lack of relevance and undue burden.  
9 Accordingly, the Parties are directed to meet and confer on the following:

10 i) Plaintiffs are directed to identify to Defendants the existing document  
11 custodians within the above three categories (user research, advertising,  
12 growth) who Plaintiffs believe are likely to possess documents responsive  
13 to RFP 16.

14 ii) The Parties will meet and confer in the event that Defendants object to  
15 Plaintiffs' list of identified document custodians, to reach agreement on the  
16 custodians that YouTube will consult pursuant to section (iii) below. To the  
17 extent any dispute remains, the Parties will update the Court in the  
18 November Discovery Management Conference Statement.

19 iii) YouTube, in turn, will consult with each agreed upon or Court-ordered  
20 identified custodian regarding the existence of non-privileged schemas,  
21 protos, software architecture documents (excluding source code),  
22 demographic surveys, user questionnaires, or other like documents that  
23 identify or describe all, or a substantial number, of the categories used by  
24 YouTube to categorize users for purposes of user research, advertising,  
25 and/or engagement.

26 iv) YouTube shall produce, subject to section (v) below, any non-privileged  
27 unproduced documents that the consulted custodians identify, are  
28 responsive to Plaintiffs' RFP 16, and can be located.

1 v) To the extent that Defendants cannot locate a responsive non-privileged  
2 unproduced document that a consulted custodian identified or otherwise  
3 object to production of such a document as unduly burdensome or  
4 disproportional, the Parties will meet and confer to reach agreement on the  
5 scope of production of documents responsive to RFP No. 16. To the extent  
6 any dispute remains, the Parties will update the Court in the November  
7 Discovery Management Conference Statement.

8 vi) YouTube shall not limit production of responsive documents, in particular  
9 user surveys and questionnaires, to only those that relate to “minors”.

10 b) With regard to RFP No. 18, which seeks documents that “constitute, identify,  
11 describe, or discuss any analysis of the demographics of users of [the YouTube  
12 Platform] [.]” the Parties have reached agreement as to this RFP with respect to  
13 production of responsive documents relating to age and gender, but have not  
14 reached agreement as to production of race/ethnicity demographics. Accordingly,  
15 the Parties are directed to meet and confer as follows regarding production of  
16 responsive documents pertaining to race/ethnicity:

17 i) Plaintiffs are directed to identify to Defendants (1) the types of documents  
18 regarding analyses of race and/or ethnicity that they are seeking through this  
19 Request; and (2) the existing document custodians who Plaintiffs believe  
20 are likely to possess those types of documents responsive to RFP 18, as it  
21 relates to race/ethnicity.

22 ii) The Parties will meet and confer in the event that Defendants object to  
23 Plaintiffs’ identification of document types and/or list of identified  
24 document custodians, including based on burden or proportionality, to reach  
25 agreement on the scope of a search of documents responsive to RFP No. 18.  
26 To the extent any dispute remains, the Parties will update the Court in the  
27 November Discovery Management Conference Statement.  
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1 DATED: October 30, 2024

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Plaintiffs’ Steering Committee Membership

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**ATTESTATION**

I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 30, 2024

By: /s/ Lauren Gallo White  
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